

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF PUERTO RICO**

-----X
In re: PROMESA
Title III
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, No. 17 BK 3283-LTS
as representative of (Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO, *et al.*
Debtors.¹

-----X
In re: PROMESA
Title III
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, No. 17 BK 3566-LTS
as representative of (Jointly Administered)
THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO,
Debtors.

**INFORMATIVE MOTION OF FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD REGARDING
APRIL 1, 2019 HEARING ON MOTIONS TO COMPEL**

To the Honorable United States Magistrate Judge Judith Gail Dein:

Pursuant to the Court's *Order Regarding Procedures for April 1, 2019 Hearing* [ECF No. 5978], the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"),

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

as the representative of The Commonwealth of Puerto Rico (the “Commonwealth”) and The Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the FOMB, as the Debtors’ representative, pursuant to § 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act, codified at 48 U.S.C. §§ 2101–2241 (“PROMESA”), respectfully states as follows:

1. ERS will be in attendance in Boston to present oral argument on any relevant matters at the hearing on **April 1, 2019 at 2:30 p.m. (AST)**.
2. William D. Dalsen will be in attendance in Boston to represent the Oversight Board on any matters relating to Movants’ motions to compel.
3. Party for which counsel will appear: The Oversight Board.

Dated: March 25, 2019
New York, NY

Respectfully submitted,

/s/ Luis F. del Valle-Emmanuelli
Luis F. del Valle-Emmanuelli
USDC-PR No. 209514
P.O. Box 79897
Carolina, Puerto Rico 00984-9897
Tel. 787.977.1932
Fax. 787.722.1932
dvelawoffices@gmail.com

OF COUNSEL FOR
A&S LEGAL STUDIO, PSC
434 Avenida Hostos
San Juan, PR 00918
Tel: (787) 751-6764/ 763-0565
Fax: (787) 763-826

Martin J. Bienenstock (pro hac vice)
Steven L. Ratner (pro hac vice)
Timothy W. Mungovan (pro hac vice)
Brian S. Rosen (pro hac vice)
Paul V. Possinger (pro hac vice)
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900
Email: mbienenstock@proskauer.com
Email: sratner@proskauer.com
Email: tmungovan@proskauer.com
Email: brosen@proskauer.com
Email: ppossinger@proskauer.com

*Attorneys for the Financial Oversight and
Management Board for Puerto Rico, as
representative of the Employees Retirement
System of the Government of the
Commonwealth of Puerto Rico*